

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

HONEYWELL INTERNATIONAL INC.; and)	
HONEYWELL INTELLECTUAL PROPERTIES)	Civil Action No. 04-1338 (***)
INC.;)	Civil Action No. 04-1337 (***)
Plaintiffs,)	Civil Action No. 04-1536 (***)
)	(Consolidated)
v.)	
)	
APPLE COMPUTER, INC., et al.)	
)	
Defendants.)	

NOTICE OF DEPOSITION
OF PLAINTIFFS HONEYWELL INTERNATIONAL INC. AND HONEYWELL
INTELLECTUAL PROPERTIES INC. PURSUANT TO FED. R. CIV. P. 30(b)(6)

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure and pursuant to Delaware Local Rules 30.1 through 30.6, Optrex America, Inc. will take the deposition upon oral examination of plaintiffs Honeywell International Inc. (“HII”) and Honeywell Intellectual Properties Inc. (“HIPI”), and specifically the witness or witnesses designated by HII and HIPI as officers, managing agents, directors, agents, employees or other person(s) who are most knowledgeable and can testify on their behalf with respect to each of the categories identified in Appendix A hereto, commencing at 9:00 a.m. on October 5, 2007, before a notary public or other officer duly authorized to administer oaths at the Hyatt Regency Phoenix, 122 North Second Street, Phoenix, Arizona, USA 85004, or such other location as mutually agreed upon by counsel. The deposition will also be videotaped.

PLEASE TAKE FURTHER NOTICE that HII and HIPI are requested to identify, on or before October 1, 2007, their designated witnesses and the matters to which each will testify.

You are invited to attend and cross-examine.

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Karen L. Pascale

September 20, 2007

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APPENDIX A

Definitions

- A. “HII” shall mean plaintiff Honeywell International Inc., and all divisions, departments, subsidiaries (whether direct or indirect), parents, affiliates, acquisitions, predecessors and entities controlled by any of them, whether domestic or foreign, including but not limited to, Allied Corporation, Bendix Corp., Honeywell Inc., Allied-Signal, and/or AlliedSignal and their respective present or former officers, directors, employees, owners, attorneys and agents, as well as consultants and any other persons acting or purporting to act on behalf of each such entity or person.
- B. “HIPI” shall mean plaintiff Honeywell Intellectual Properties Inc., and all divisions, departments, subsidiaries (whether direct or indirect), parents, affiliates, acquisitions, predecessors and entities controlled by any of them, whether domestic or foreign, including but not limited to, Allied Corporation, Bendix Corp., Honeywell Inc., Allied-Signal, and/or AlliedSignal and their respective present or former officers, directors, employees, owners, attorneys and agents, as well as consultants and any other persons acting or purporting to act on behalf of each such entity or person.
- C. “Plaintiffs” or “Honeywell” shall mean HII and HIPI both individually and collectively.
- D. “LCD” shall mean liquid crystal display.
- E. “LCD Module” shall mean an LCD including a liquid crystal panel and other components for incorporation into another product to provide a viewable image to a user.

Topics

1. The Society for Information Display Symposium 2000 Trip Report that appears to be authored by R. David Lanning, produced at HW025504-HW025512.
2. Any report or document other than HW025504-HW025512 prepared by a Honeywell employee, agent, or officer reporting on or summarizing any Society for Information Display Symposium, from the 1994-2002 timeframe.
3. The rights, privileges, responsibilities, and duties of Honeywell as a “Sustaining Member” of the Society for Information Display, for the particular years that it was such a “Sustaining Member.”
4. The LCD Module samples provided by Optrex to Honeywell in connection with Honeywell’s development of the KLN94 display, particularly including the modules shown in HW025501-25502 and discussed in the second and third paragraphs of Denise Rahne’s August 29, 2007 letter to Alexander Gasser.
5. LCD Module samples provided or demonstrated by Optrex to Honeywell between 1994-2002.

CERTIFICATE OF SERVICE

I, Karen L. Pascale, hereby certify that on September 20, 2007, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of Court using CM/ECF which will send notification of such filing to the following counsel of record:

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I further certify that on September 20, 2007, I caused a copy of the foregoing document to be served upon the following counsel of record as indicated below:

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